

# **Exhibit 3**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>  <b>This Document Relates to All Cases</b>  <hr/>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**DEFENDANTS' INTERROGATORIES AND  
REQUESTS FOR PRODUCTION TO PLAINTIFFS**

Defendants Ethicon, Inc. and Johnson & Johnson, pursuant to FED. R. CIV. P. 33 AND 34, submit these interrogatories and requests for production of documents to Plaintiffs.

In responding to the Interrogatories and Requests for Production of Documents below, please furnish all information in your possession and the possession of all other persons acting on your behalf.

Each Interrogatory calls for not only your knowledge, but also all information that is available to you by reasonable inquiry and due diligence, including inquiry of your agents, representatives, and attorneys. Each document request calls for documents within your custody or control, including the custody or control of your agents, representatives, and attorneys.

“Pelvic mesh surgery” means any surgery for the treatment of stress urinary incontinence or pelvic organ prolapse. It includes, but is not limited to, such terms as “bladder surgery,” “sling surgery,” “prolapse surgery,” and any other term encompassing pelvic surgery.

An “unsolicited” phone call includes any communication that was not requested, sought, or specifically invited.

“Advertisement” means all television, print, radio, internet banner ads on non-lawyer sites, US mail, email, outbound telemarketing, billboard, pamphlet, brochure, DVD and/or CD or other form of printed, visual, video, audio, electronic or digital communication, advertising or

article disseminated by or for plaintiff lawyers or co-counsel firms related to pelvic mesh, stress urinary incontinence, or pelvic organ prolapse.

“Identify” or “explain” means to provide detailed and specific information about the subject of the interrogatory, including without limitation: the substance or content of any oral or written communication, including a complete description of any advertisements; the names of any person or entities involved; and the date(s) on which any communication, including advertising, occurred.

### **ADVERTISEMENT SOLICITATIONS**

1. When did you, or anyone acting on your behalf, first contact a lawyer about your pelvic mesh surgery?
2. Had you or anyone else at your house seen a lawyer advertisement about pelvic mesh before the date you answered in response to Interrogatory No. 1? If so, please identify.

### **PHONE CALL SOLICITATIONS**

3. Have you or anyone else at your house ever received an unsolicited phone call where the caller inquired about pelvic mesh surgery? If so, please identify.

### **PHONE CALLS FOLLOW UP**

4. When did you or anyone else at your house first receive such an unsolicited phone call? Please identify.
5. Did the caller encourage you or anyone else at your house to file a lawsuit? If so, please explain.
6. Did the caller tell you or anyone else at your house that you or anyone else at your house was entitled to money? If so, please explain.
7. Did the caller encourage you (or anyone else at your house) to not be honest in any respect concerning pelvic mesh? If so, please explain.
8. Did the caller claim to know medical information about you or anyone else at your house? If so, please explain.
9. Did the caller tell you (or anyone else at your house) that he or she was affiliated in any way with:

- a. The FDA?
  - b. Johnson & Johnson?
  - c. Any lawyer or law firm?
10. As a result of the unsolicited phone call, did you fill out any sort of questionnaire? If so, please identify.
11. As a result of the unsolicited phone call, were you (or anyone else at your house) put into contact with any lawyer or law firm? If so, please identify.

### **REQUESTS FOR PRODUCTION**

1. Produce any documents relating in any way to a lawyer advertisement about pelvic mesh surgery.
2. Produce any documents relating in any way to an unsolicited phone call concerning pelvic mesh surgery.
3. Produce any documents relating in any way to unsolicited written or electronic communications (other than from your lawyer) concerning pelvic mesh surgery.
4. Produce any documents referenced in Interrogatory No. 10.

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